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**C. REMARKS****1. Examiner Interview**

Applicants note with appreciation the telephonic interview conducted between Applicants' patent agent, Scott Schmok, and the Examiner on November 14, 2003. During the telephonic interview, Applicants' patent agent and the Examiner discussed differences between Applicants' invention and the prior art reference cited (Boudec Le J-Y et al., Connectionless Data Service in an ATM-based Customer Premises Network, hereinafter Boudec). The Examiner agreed that Boudec does not teach or suggest using a forwarding node to "swap ...[a] second label associated with a backward direction using [a] swapping table" as claimed by Applicants. The Examiner suggested that other art that was not cited in the Office Action, such as patent number 5,579,480, may also be applicable to Applicants claims. However, art that has not been cited as a reference in the Office Action has not been addressed in this Response. Applicants respectfully request that the Examiner include such additional art in the formal record. During the telephonic interview, the Examiner agreed that the prior art does not teach or suggest Applicants claim 3 and that claim 3 would be allowable if written in independent form. Applicants' claim 8 is an apparatus claim with the same limitations as claim 3 and the Examiner agreed that claim 8 would also be allowable if written in independent form. During the interview, the Examiner also agreed that the Boudec reference does not teach or suggest the "forwarding node swapping a second label associated with a backward direction using a swapping table" claimed in the third element of Applicants claim 1. However, as

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discussed above, the Examiner suggested that art not cited in the Office Action may teach or suggest this element of Applicants claim 1. Therefore, no agreement was reached as to the allowability of Applicants' claim 1.

**2. Summary**

Claims 1, 2, 4-7, and 9-16 are currently pending in the application. Claims 1, 6, and 11 are independent claims. Claim 6 has been amended. Claims 3 and 8 have been canceled. Claims 9, 10, 12-15 have been added. Claim 11 represents dependent claim 3 in independent form. Reconsideration of the claims is respectfully requested. No new matter has been added by these amendments.

**3. Drawings**

Applicants note with appreciation the acceptance of Applicants' formal drawings filed on January 14, 2000.

**4. Claim Rejections 35 U.S.C. § 102**

Claims 1, 2, and 4-7, stand rejected under 35 U.S.C. § 102(b) as being anticipated by an article entitled "Connectionless data service in an ATM-based customer premises network" by Boudec et al. (hereinafter "Boudec"). Applicants respectfully traverse the rejections.

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A. Method Claims 1, 2, 4 and 5.

The limitations set forth in Applicants' claim 1 include:

the sending nodes include a first label into each of the cells representing an identification of the routing of the cell;

the sending nodes include a second label into each of the cells representing an identification of the source of the cell;

the forwarding node swaps both the first label associated with a forward direction and the second label associated with a backward direction using the swapping table.

Applicant's second element of claim 1 includes a limitation of the *sending nodes* including "a second label into each of the cells representing an identification of the source of the cell." In contrast, Boudec teaches away from using a second label in a cell to represent an identification of the source of the cell. Instead, Boudec uses, as a second label, a Message Identification (MID) field which is a "local, temporary multiplexing assist, that is used solely for gluing the different segments of a message together" (pg. 1411, second column, lines 26-29). In addition, Boudec illustrates three clients each using an MID of "m" for cell transport. Because Boudec teaches that each client uses the same second label (e.g. MID), Boudec clearly does not teach or suggest using a second label to represent an identification of the source of the cell as claimed by Applicants.

Applicants third element of claim 1 includes a limitation that a "forwarding node swaps ...[a] second label associated with a backward direction using [a] swapping

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table" In contrast, Boudec teaches "swap[ing] the MID field in order to guarantee frame integrity" (pg 1418, first column, lines 25-27) and does not consider a backward direction nor does it access a swapping table. During the Examiner Interview, the Examiner agreed that Boudec does not teach or suggest a "forwarding node swapping a second label associated with a backward direction using a swapping table" as claimed by Applicants. Therefore, claim 1 is allowable under 35 U.S.C. § 102 over Boudec for at least the reasons given above.

Notwithstanding that fact, that claim 2 is dependent upon amended claim 1 and is therefore allowable for at least the same reasons as claim 1, claim 2 is also allowable as this claim is not anticipated by Boudec. Claim 2 further limits claim 1 by claiming the additional limitations of:

"the forwarding node swaps the first and the second label according to the same swapping table"

Boudec simply does not use a swapping table to change the second label and, therefore, does not teach or suggest "swap[ing] the first and the second label according to the same swapping table" as claimed by Applicants. Therefore, the rejection of claim 2 has been traversed and claim 2 is allowable under 35 U.S.C. § 102 in light of Boudec.

Claim 5 is a multiply dependent claim depended upon either claims 1, 2, or 4 therefore allowable for at least the same reasons as claims 1, 2, and 4 are allowable. Notwithstanding this fact, claim 5 is also allowable as it

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is not anticipated by Boudec. Claim 5 claims the additional limitations of:

"the first label is written in and read from a VPI field of the respective cell and the second label is written in and read from a VCI field of the respective cell"

As claimed by Applicants in claim 5, Applicants use VPI fields and VCI fields for different functions. Applicants use a VPI field to represent an identification of the routing of the cell and Applicants use a VCI field to represent an identification of the source of the cell. In contrast, Boudec does not distinguish between a VPI field and a VCI field. Boudec uses "the value in the **VPI/VCI field as a destination domain address**" (pg. 1417, first column, line 24). In addition, Boudec teaches away from a forwarding node swapping the values in the VPI and VCI in that Boudec teaches that "the value of the VPI/VCI field for the outgoing cell is **unchanged..**" (pg. 1417, second column, lines 1-3, emphasis added). Applicants assert, therefore, that claim 5 is allowable for at least the reasons given above.

**B. Method Claims 11-16.**

Claim 11 is original claim 3 represented in independent form. Claim 11 includes the limitations of claim 1 and is allowable for at least the reasons given above for claim 1. In addition, as discussed above in the summary of the Examiner Interview, the Examiner agreed that the prior art does not teach or suggest Applicants claim 3.

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Claim 3 has been rewritten in independent form and represented as new claim 11.

The limitations set forth in Applicants' claim 11 include:

the sending nodes include a first label into each of the cells representing an identification of the routing of the cell;

the sending nodes include a second label into each of the cells representing an identification of the source of the cell;

the forwarding node swaps both the first label associated with a forward direction and the second label associated with a backward direction using the swapping table; and

with respect to the second label, the forwarding node enters the swapping table in the column of the output labels and reads the corresponding input label.

Applicants forth element of claim 11 includes a limitation of "with respect to the second label, the forwarding node enters the swapping table in the column of the output labels and reads the corresponding input label." In contrast, Applicants assert that Boudec does not use a swapping table with respect to the second label and, therefore, does not access a swapping table's output column to read a corresponding input label. Therefore, as agreed to in the Examiner Interview, the prior art does not teach or suggest a "forwarding node enter[ing] the swapping table in the column of the output labels and reads the corresponding input label." as taught and claimed by Applicants and thus, claim 11 is allowable for at least the reasons given above.

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Claim 12 is a more limited version of original claim 2, as claim 12 depends upon claim 11 which includes additional limitations not included in claim 1 (claim 2's parent claim). Therefore, claim 12 is allowable for at least the same reasons as claim 2 is allowable as set forth above. In particular, Boudec does not use a swapping table to change the second label. Thus, because Boudec does not teach or suggest "*swap(ing) the first and the second label according to the same swapping table*" as claimed by Applicants, claim 12 is also allowable over Boudec. In addition, claim 12 is allowable because it depends on claim 11 which was deemed allowable by the Examiner during the Examiner Interview.

Claim 13 is dependent upon claim 12 and is therefore allowable for at least the same reasons as claim 12, claim 13 is also allowable as this claim is not anticipated by Boudec. Claim 13 further limits claim 12 by claiming the additional limitations of:

"the first label is written in and read from a VPI field of the respective cell and the second label is written in and read from a VCI field of the respective cell"

As claimed by Applicants in claim 13, Applicants use VPI fields and VCI fields for different functions. Applicants use a VPI field to represent an identification of the routing of the cell and Applicants use a VCI field to represent an identification of the source of the cell. In contrast, Boudec does not distinguish between a VPI field and a VCI field. Boudec uses "the value in the

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*VPI/VCI field as a destination domain address" (pg. 1417, first column, line 24). In addition, Boudec teaches away from a forwarding node swapping the values in the VPI and VCI in that Boudec teaches that "the value of the VPI/VCI field for the outgoing cell is unchanged.."(pg. 1417, second column, lines 1-3, emphasis added). Applicants assert, therefore, that claim 13 is allowable for at least the reasons given above.*

Claim 14-16 are each dependent upon claim 11 and, therefore are allowable for at least the same reasons as claim 1 is allowable.

C. Apparatus Claims 6, 7, 9 and 10.

Claim 6 is an apparatus claim including the same limitations as set forth in claim 11. Therefore, claim 6 is allowable for at least the same reasons set forth above for claim 11. Furthermore, during the Examiner Interview, the Examiner agreed that claim 6 would be allowable over the prior art if amended to include the limitations of claim 8. Consequently, Applicants have amended claim 6 to include the limitations of claim 8.

Claims 7, 9 and 10 are each dependent upon claim 6 and are therefore allowable for at least the same reasons as claim 6 is allowable, as described above. In addition, Claim 7 is an apparatus claim including the same limitations as set forth in claim 12. Therefore, Applicants assert that claim 7 is allowable for at least the same reasons set forth above for claim 12. Claim 9 is an apparatus claim including the same limitations as set

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forth in claim 14 and claim 10 is an apparatus claim including the same limitations as set forth in claim 13. Therefore, claims 9 and 10 are allowable for the same reasons as claims 14 and 13, respectively, are allowable, as described above.

**CONCLUSION**

As a result of the foregoing, it is asserted by Applicants that the claims presented in this amendment corresponding to the Application are in condition for allowance, and Applicants respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

By

  
Joseph T. Van Leeuwen  
Attorney for Applicants  
Registration No. 44,383  
Telephone: (512) 301-6738  
Facsimile: (512) 301-6742

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